

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

DEUTSCHE BANK TRUST COMPANY	:	Court File No. 11-cv-1452 (MJD/AJB)
AMERICAS, in its capacity as successor indenture trustee for certain series of Senior Notes, et. al.,	:	
Plaintiffs,	:	<u>NOTICE OF PLAINTIFFS'</u>
vs.	:	<u>MOTION FOR (i) LEAVE TO FILE</u>
U.S. BANK, N.A.	:	<u>THE SECOND AMENDED</u>
	:	<u>COMPLAINT AND (ii) AN ORDER</u>
Defendant.	:	<u>CLARIFYING OR MODIFYING</u>
	:	<u>THE COURT'S PRIOR SEALING</u>
	:	<u>ORDER</u>
	:	

TO: DEFENDANT ABOVE-NAMED AND ITS ATTORNEYS.

PLEASE TAKE NOTICE that Plaintiffs bring this Motion for (i) Leave to File the Second Amended Complaint and (ii) an Order Clarifying or Modifying the Court's Prior Sealing Order in this Action before the Honorable Arthur J. Boylan, Chief Magistrate Judge of the United States District Court, District of Minnesota, Courtroom 9E, United States Courthouse, 300 South Fourth Street, Minneapolis, Minnesota, 55415 for hearing on October 14, 2011 at 10:30 for an order (i) granting Plaintiffs' to file a Second Amended Complaint and (ii) to permit Plaintiffs to file under seal in future filings, including Exhibit A to the Second Amended Complaint, information regarding payments made to defendants in connection with Tribune Company's 2007 leveraged buyout.

Dated this 28th day of September, 2011.

KELLEY, WOLTER & SCOTT, P.A.

s/Kevin M. Magnuson
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